THE PRITCHARD LAW FIRM, PLLC DAVID L. PRITCHARD 1244 SOUTHRIDGE COURT, STE 102 HURST, TX 76053 (817) 285-8017 (817)285-0224 FACSIMILE STATE BAR #16349990

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE: DIANNE LOUISE DORMAN	*	CASE NO. 22-40421-elm13
	*	CHAPTER 13
DEBTOR,	*	_
,	*	
	*	
	*	
	*	

### **OBJECTION BY EECU TO DEBTOR'S PLAN**

COMES NOW, EECU and objects to the Debtor's Chapter 13 plan as follows:

## 2013 GMC ACADIA

- The **Debtor DIANE LOUISE DORMAN** entered into a Motor Vehicle Retail Instalment Sales Contract providing for the Debtor's purchase of a 2013 GMC ACADIA. EECU is the holder and owner of said account and contract.
- 2. The Debtor's plan does not adequately provide for payment of the EECU debt. The plan provides for payment to EECU **pro rata**. Debtor is approximately 2 (two) months behind on pre-petition payments on this account. Debtor's plan essentially proposes the Debtor drive the vehicle for over 4 (four) months without making payment.
- 3. The Debtor's plan does not adequately provide for payment of the EECU debt.
- 4. This plan is not proposed in good faith as to EECU.
- 5. The plan should not be confirmed as presented and the case should be converted to a chapter 7 or the Debtor to provide a plan that provides proper treatment of EECU claim.

Wherefore, EECU prays the Court deny confirmation of the Debtors' plan and such relief as

it may be entitled.

Respectfully submitted, THE PRITCHARD LAW FIRM, PLLC

## /s/ David L. Pritchard\_

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing to Objection was mailed to the following people by placing same in the United States Mail, postage prepaid, properly addressed to and/or Pursuant to the ECF guidelines:

NICHOLAS C. INMAN ALLMAND LAW FIRM, PLLC 860 AIRPORT FREEWAY, SUITE 401 HURST, TEXAS 76054

### DIANNE LOUISE DORMAN

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TRUSTEE PAM BASSEL 7001 BLVD 26

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**US TRUSTEE** 

1100 COMMERCE STREET ROOM 976 DALLAS, TEXAS 75242-1496

Date: May 5, 2022 /s/ David L. Pritchard

By: David L. Pritchard